

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

Felix A. Concepcion Crespo  
Debtor

CASE NO. 10-11394 SEK

CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

**TO THE HONORABLE COURT:**

COMES NOW, creditor Empresas Berríos Financiera represented by the undersigned attorney, and very respectfully ALLEGES, STATES and PRAYS:

1. On December 3, 2010 Debtor filed a proposed Chapter 13 Payment Plan.
2. Empresas Berríos Financiera is a secured creditor in the present case. (*See Proof of Claim #3-1*)
3. That Debtor's Payment Plan does not include any type of treatment for the appearing creditor.
4. Empresas Berríos Financiera objects to the confirmation of such Plan because the Debtor failed to provide treatment for the appearing creditor's claim.
5. 11 USC §1325 (5)(A) states that the court shall confirm a plan with respect to each allowed secured claim if the holder of such claim has accepted the plan.

WHEREFORE, it is respectfully requested from this Honorable Court to deny the confirmation of Debtor's Payment Plan.

**I HEREBY CERTIFY:** that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Debtor's Attorney Irving K. Hernandez Vals, Chapter 13 Trustee Jose Ramon Carrion Morales Esq. US Trustee Monsita Lecaroz Arribas, Esq. and to all those who in this case have registered for receipt of notice by electronic mail.

**RESPECTFULLY SUBMITTED:**

In Toa Alta, Puerto Rico this 15 day of February 2011.

/s/ Jose Bague Ramos, Esq.  
PO Box 624  
Toa Alta PR 00954  
Tel. (787) 360-1818  
[jbaguelaw@gmail.com](mailto:jbaguelaw@gmail.com)  
USDC 225014